

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII 324 EAST ELEVENTH STREET KANSAS CITY, MISSOURI - 64106

FEB 23 1981

James Brockland
Perfection Manufacturing Company
5441 Bulwer Avenue
St. Louis, Missouri 63147

Dear Mr. Brockland:

EPA I.D. No. MOD041885856

Facility Address: St. Louis, Missouri

Your firm has notified as a treatment, storage, or disposal facility, pursuant to Section 3010 of the Resource Conservation and Recovery Act (RCRA). That notification was required following the May 19, 1980, and July 16, 1980, promulgation of regulations, which included the identification and listings of hazardous wastes (40 CFR Part 261) under the authority of Section 3001 of RCRA.

The May 19, 1980, regulations have been amended numerous times since that date as follows: July 16, 1980 (Federal Register, Vol. 45, p. 47832); October 30, 1980 (Federal Register, Vol. 45, p. 72024); November 12, 1980 (Federal Register, Vol. 45, p. 74884); November 17, 1980 (Federal Register, Vol. 45, p. 76074); November 19, 1980 (Federal Register, Vol. 45, p. 76618); and November 25, 1980 (Federal Register, Vol. 45, p. 78524). These amendments included changes in the identification and listing of regulated hazardous wastes as well as expansion of those facilities that are exempt from the specific permit requirements of 40 CFR Part 265 but are subject to 40 CFR Part 266 and Part 122.26, permits-by-rule.

According to our records, your firm's Notification of Hazardous Waste Activity form (8700-12) shows your facility stores (over 90 days), treats or disposes of hazardous wastes at the location noted. Thus, your firm should have filed a Part A Permit Application by November 19, 1980, or, January 16, 1981. There is no record at the EPA that you have submitted such an application. Therefore, pursuant to the authority of Section 3007 of RCRA, you are hereby requested to provide the answers to the following questions:

- 1. What are the specific types and amounts of hazardous wastes treated, stored or disposed of at the subject facility since November 19, 1980?
- 2. What are the specific types and amounts of hazardous wastes treated, stored or disposed of at the subject facility since January 16, 1981?



- 3. Please indicate why you have not submitted a Part A Permit Application (Forms 1 and 3) under RCRA.
- 4. If you have submitted your Part A Permit Application, on what date did you submit it? Was it addressed to the U.S. EPA, Region VII, P.O. Box 15606, Kansas City, Missouri, 64106? In addition, please forward a copy of Forms 1 and 3 of the Permit Application.

This information is required within 15 days of receipt of this letter and should be directed to Michael J. Sanderson, Enforcement Division, U.S. Environmental Protection Agency, Region VII, 324 East 11th Street, Kansas City, Missouri 64106. Providing the information requested does not satisfy the permit application requirement of RCRA.

If you have any questions on this matter, please contact David Doyle at the address set forth above or by telephone at (816) 374-6248 or 374-2576

Louise D. Jacobs

Director

Enforcement Division

Region VII